

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Evergy)	
Metro, Inc., Evergy Kansas South, Inc.,)	
and Evergy Kansas Central, Inc. for Approval)	
of its Demand-Side management Portfolio)	22-EKME-254-TAR
Pursuant to the Kansas Energy Efficiency)	
Investment Act (“KEEIA”), K.S.A. 66-1283.)	

PUBLIC

DIRECT TESTIMONY

PREPARED BY

DOUGLAS W. HALL

UTILITIES DIVISION

KANSAS CORPORATION COMMISSION

June 17, 2022

1 **I. Introduction, Qualifications, and Purpose of Testimony**

2 **Q. What is your name?**

3 A. My name is Douglas W. Hall.

4 **Q. By whom and in what capacity are you employed?**

5 A. I am employed by the Kansas Corporation Commission (KCC or Commission) as
6 a Rate Analyst in the Audit Section within the Utilities Division.

7 **Q. What is your business address?**

8 A. 1500 S.W. Arrowhead Road, Topeka, Kansas, 66604-4027.

9 **Q. What is your educational background and professional experience?**

10 A. I hold Bachelor's Degrees in Economics and Mathematics from Colorado State
11 University. I began my career at the KCC as a Research Economist in October of
12 2019. I have been a Rate Analyst with the KCC since August 2020.

13 **Q. Have you previously submitted testimony before this Commission?**

14 A. Yes, I have submitted testimony in Docket No. 20-SPEE-169-RTS. I have also
15 contributed substantively to several Report and Recommendations as a member of
16 Commission Staff in several other dockets.

17 **Q. What is the purpose of your testimony?**

18 A. The purpose of my testimony is to provide Staff's review and response to the
19 proposal of Evergy Kansas Metro, Inc. and Evergy Kansas Central, Inc. and Evergy
20 Kansas South, Inc. (collectively as Evergy) for recovering lost revenue
21 (Throughput Disincentive or TD) as a result of reduced energy sales caused by the

1 implementation of Demand-Side Management (DSM) programs.¹ Additionally, I
2 recommend two changes to Evergy's proposal to minimize the cost of these energy
3 efficiency programs on non-participating ratepayers: that lost revenue recovery be
4 capped at the level of Evergy's last-approved revenue requirement, and that Staff's
5 approximation of variable costs be removed from Evergy's proposed net marginal
6 revenue rates (used in the calculation of lost revenues).

7 **II. Executive Summary**

8 **Q. Please provide an executive summary of your testimony.**

9 A. Throughout this testimony, I will present and support the following conclusions:

10 Concerns Regarding Evergy's Throughput Disincentive (TD) Proposal

- 11 • The TD proposal could potentially result in over-recovery relative to the
12 benefits of the DSM programs. This concern is exacerbated by the fact that
13 some programs result in lost revenue recovery even greater than the benefits
14 from the programs, magnifying the cost of those programs to non-
15 participant ratepayers.
- 16 • Evergy's proposed net marginal revenue rates are based on the assumption
17 that all of Evergy's costs are fixed costs. In reality however, some of
18 Evergy's costs are variable costs that decrease as energy generated/sold
19 decreases, and should be excluded from Evergy's lost revenue calculations.

20 Staff's Recommended Modifications for Evergy's TD Proposal

¹ Inclusive of Energy Efficiency and Demand Response programs.

- 1 • Staff recommends capping lost revenue recovery at Evergy's last-approved
2 base revenue requirement. In the absence of DSM programs, the revenue
3 requirement is calculated from the expected cost of service. The cap ensures
4 that Evergy is able to recover its costs without over-recovering.

5 **III. Evergy's TD Recovery Mechanism**

6 **A. Evergy's Proposal for a TD Recovery Mechanism**

7
8 **Q. Please describe the issue of lost revenue due to DSM programs.**

9 A. The implementation of DSM programs reduces the amount of electricity used by
10 customers, resulting in lower revenue to the utility. Billing determinants are agreed
11 upon during the most recent rate case prior to the implementation of the DSM
12 programs. Because some costs are fixed, the loss of revenue from DSM programs
13 can have a negative financial impact on Evergy, thus the disincentive aspect of
14 DSM programs that can be cured by a TD recovery mechanism.

15 **Q. Please describe Evergy's proposal for a TD recovery mechanism.**

16 A. The TD recovery mechanism is described as one component of the requested
17 Energy Efficiency Rider (EER) in Charles Caisley's testimony filed as a part of
18 Evergy's application. Mr. Caisley describes the rider as follows:

19 The update to the EER Rider includes timely recovery of three
20 financial components: program costs, the Throughput Disincentive
21 (TD), and an Earnings Opportunity (EO) award. Evergy is
22 requesting approval of an update of the EER to begin collecting
23 actual program costs and TD, which is directly attributable to the
24 demand-side programs approved in this filing, with carrying costs at
25 the Companies' pre-tax cost of capital over a 12-month period
26 following each program year. The EER Rider will be updated
27 annually following each program year with and will include an

1 additional reconciliation of the prior periods program costs and TD
2 recoveries with carrying costs on any under- or over-recovery.²
3

4 On page 49 of Evergy's DSM Portfolio Filing, it states:

5 Timely recovery is also required for the impact of reduced electricity
6 sales. Recovery of the reduced sales does not provide additional
7 earnings to Evergy, but rather keeps Evergy whole consistent with its
8 existing regulatory framework and as required by KEEIA. Without
9 proper alignment of Evergy's financial incentives, the success of EE
10 programs will result in negative impacts to Evergy's financial
11 performance as both earnings and cash flow will be affected.
12 Providing recovery of the lost sales associated with EE reverses the
13 negative financial effects by Evergy.... Evergy proposes the use of
14 a TD model to calculate the effect of deemed kWh savings, net of
15 assumed NTG [(Net To Gross)] factors in the Company's TRM
16 [technical resource manual], resulting from energy efficiency
17 measures installed on Evergy's kWh sales and revenues.³
18

19 The formula for Evergy's TD model is presented in its proposed Energy Efficiency

20 Rider tariffs, attached as Appendix A.

21 **B. Evergy's Support for its TD Recovery Model**
22

23 **Q. What evidence does Evergy provide in support of its TD recovery model?**

24 A. Evergy cites K.S.A. 66-1283 (the KEEIA statute) in several places as well as
25 Financial Accounting Standards Board Accounting Standards Codification (ASC)
26 980-605-25 "Alternative Revenue Programs", of which Evergy states:

27 ASC-980-605-25 sets three conditions for revenues resulting from
28 alternative revenue programs such as the EER.
29

30 First, the program must be established by order of the regulatory
31 commission allowing for automatic adjustment of future rates.
32 Second, the amount of revenue for the period must be objectively
33 determinable and probable of recovery. Lastly, the revenues must
34 be collected within 24 months of the period in which they are
35 recognized. If the TD is subjected to subsequent recalculation,
36 Evergy would not be able to recognize the revenue in the periods

² Direct Testimony of Charles A. Caisley on behalf of Evergy, p. 8 (Dec. 17, 2021) (Caisley Direct).

³ Evergy's KEEIA 2023-2026 Demand-Side Management Portfolio Filing, p. 49 (Dec. 17, 2021).

1 that sales were reduced which would not result in alignment of
2 utility financial incentives.⁴

3
4 Eversource does not provide any further substantive argument in its application as
5 to why its proposed TD recovery mechanism should be favored over any other
6 option to “ensure that the financial incentives for an electric public utility are
7 aligned with helping such utility’s customers use energy more efficiently and in a
8 manner that sustains or enhances such customers’ incentives to use energy more
9 efficiently.”⁵ Options made available to the Commission by the KEEIA statute
10 include: Capitalization of investments in and expenditures for demand-side
11 programs; recovery of lost revenue associated with demand-side programs;
12 decoupling; rate design modifications; accelerated depreciation on demand-side
13 investments; and allowing the public utility to retain a portion of the net benefits of
14 a demand-side program for its shareholders.⁶

15 **Q. Does Staff agree that TD is an issue when implementing DSM programs?**

16 A. Yes, Staff views the TD as an issue that should be addressed, as some of the fixed
17 costs that Eversource recovers from base rates are embedded in the variable per kilowatt
18 hour (kWh) rate. When customers use less electricity due to DSM measures,
19 Eversource would then recover less of their fixed costs.

20 **C. Historical Discussion Regarding Lost Revenue Adjustment**
21 **Mechanisms**
22

⁴ Eversource Application, Appendix E, p. 3 (Dec. 17, 2021) (Application).

⁵ See K.S.A. 66-1283(e)(2).

⁶ See K.S.A 66-1283(d)(1).

1 **Q. What options for TD recovery have been historically considered?**

2 A. In Docket 08-GIMX-441-GIV (08-441 Docket), three options for TD recovery
3 were considered: lost margin recovery, now frequently referred to as lost revenue
4 adjustment mechanism (LRAM), decoupling, and straight fixed-variable rate
5 design.⁷

6 An LRAM estimates the amount of revenue attributable to a DSM program
7 based on participant measure count and values taken from a TRM, for example, the
8 monthly difference in energy consumption when replacing an incandescent light
9 bulb with an LED equivalent.

10 Decoupling is so named for breaking the link between energy sales and revenue
11 recovery. If the utility were to recover less than its revenue requirement, full or
12 partial decoupling would allow rates to be adjusted to make up the difference over
13 the next period. Limited decoupling more narrowly defines recoverable revenue
14 by specifying that only revenue changes attributable to allowed causal effects can
15 be recovered. For example, under a limited decoupling mechanism designed for
16 DSM programs, revenue lost due to unusual weather or decline in the number of
17 customers may be deemed unrecoverable even though those also cause revenue to
18 fall short of the revenue requirement.

19 A straight fixed-variable rate design would recover all of the utility's fixed costs
20 through a fixed customer charge. For electric utilities, this works well for larger
21 industrial or commercial customers, but would be prohibitively burdensome on

⁷ See generally Final Order, Docket No. 08-GIMX-441-GIV (Nov. 14, 2008) (08-441 Final Order).

1 residential and small business customers. Hence, Staff does not consider this a
2 viable option in the instant docket.

3 **Q. What has been recommended in prior dockets regarding TD recovery?**

4 A. In the Final Order in the 08-441 Docket, the Commission stated the following
5 regarding TD recovery mechanisms:

6 The Commission does not favor Lost Margin Recovery because of
7 the high premium this method places on accurate evaluation of
8 program impacts and the increased potential for expensive and time-
9 consuming litigation arising from disputes. Staff Report, 16.
10 Furthermore, while Commission staff expertise is growing in this
11 highly technical field, at this time the Commission does not have the
12 depth of experience available to consider this method without
13 reliance on outside firms.

14
15 Another problem with the Lost Margin Recovery method is dealing
16 with the issue of measuring the effect of "free ridership" when
17 evaluating the impacts of an energy efficiency program. Free riders
18 are a term for customers who take advantage of an energy efficiency
19 program but would have undertaken their energy efficiency efforts
20 whether the utility offered that program or not. The laudable, self-
21 directed efforts of these customers result in overestimation of the
22 decline in energy caused by the energy efficiency program unless
23 accounted for accurately. The full decoupling method avoids this
24 and other difficult issues involved in accurately assessing a decline
25 in usage actually attributable to an energy efficiency program
26 because the reason for a decline in usage is irrelevant. The utility
27 will recover its lost sales no matter whether the reason is weather,
28 the economy, or energy efficiency programs.

29
30 Within the context of decoupling as means of removing the
31 throughput disincentive for energy efficiency programs at issue in
32 this docket, the Commission is highly unlikely to address a
33 decoupling proposal without a demonstrated connection to an
34 energy efficiency program application or to existing programs.
35 While decoupling addresses the throughput incentive issue, Staff's
36 Report noted it provides the utility with an incentive to cut costs
37 without any regard for energy efficiency. Staff Report, 13. The
38 utility must demonstrate that decoupling makes economic sense in

1 the context of the utility's energy efficiency program or suite of
2 programs.⁸

3
4 Westar and KCP&L also participated in the 08-441 Docket, with their input
5 summarized in the Final Order as stating:

6 Westar observes that as a method of addressing the throughput incentive,
7 decoupling may be administratively burdensome and a straight fixed-
8 variable rate design would be simpler. As configured for modest losses of
9 revenue, argues Westar, the volumetric charge component would be
10 sufficient to encourage consumption reduction.⁹

11
12 and

13 KCP&L suggests utilities should be able to submit a throughput incentive
14 proposal on a case-by-case basis, but should not have to risk a lower return
15 on equity.¹⁰

16
17 In Docket No. 12-GIMX-337-GIV, the Commission reiterated in its Order its
18 position on LRAMs:

19 The 441 Order cited four flaws in lost margin recovery: (1) it places
20 too much weight on accurate evaluation of program impacts; (2) it
21 increases the potential for expensive, time-consuming litigation; (3)
22 it forces the Commission to rely on outside firms to evaluate the
23 methodology; and (4) it fails to measure free ridership in evaluating
24 the impact of energy efficiency programs. The Commission also
25 notes allowing recovery of lost margin creates a subsidy for energy
26 efficiency programs that can violate the fundamental ratemaking
27 principle of cost causation, especially when one group of ratepayers
28 subsidizes the lost margins caused by other consumers who enroll
29 in and benefit from an energy efficiency program. For example, if a
30 utility replaces the electrical appliances of one group of customers
31 as part of an energy efficiency program, which in certain
32 circumstances may reduce its net profits, it would be unfair to ask
33 non-participants to pay for the reduction caused by a program from
34 which they received little benefit. Under the principle of cost
35 causation, the participants in the energy efficiency programs alone
36 should be responsible for any reduction in revenue resulting from
37 the energy efficiency program.

⁸ 08-441 Final Order, at 22.

⁹ *Id.* at 17.

¹⁰ *Id.* at 18.

1
2 If industry is able to propose a program which minimizes the
3 inherent problems with lost margin recovery, the Commission may
4 be open to allowing lost margin recovery. In particular, the
5 Commission is concerned with all ratepayers essentially subsidizing
6 the program participants. Measures such as making program
7 participants bear a greater share of program costs, enacting sunset
8 provisions, or proposing other steps that will reduce the size and
9 duration of the subsidy will be considered by the Commission.¹¹

10
11 In Docket No. 16-KCPE-446-TAR, Kansas City Power & Light Company
12 (KCP&L, now Evergy Metro) filed an application for approval of an EE portfolio
13 including a lost revenue recovery mechanism.¹² Dr. Robert Glass filed testimony
14 on behalf of Staff instead proposing a decoupling mechanism:

15 If the demand-side programs result in a reduction in energy use to
16 the point that KCP&L is not recovering its approved revenue
17 requirement, then KCP&L will recover the difference between its
18 approved revenue requirement and its actual revenue collection if
19 the EM&V shows the lost revenue was due to demand-side
20 programs. If KCP&L does collect its revenue requirement, then the
21 demand-side programs have not hurt KCP&L.¹³

22
23 **D. Staff's Concerns Regarding Evergy's Proposal**

24
25 **Q. Does Staff have any general concerns with Evergy's proposed TD recovery**
26 **mechanism?**

27 **A.** Staff does have a concern with the TD calculation in the proposed EER tariff, in
28 that it may permit over-recovery of Evergy's revenue requirement. Because it is
29 infeasible to obtain an exact measure of how much energy is being saved due to
30 DSM measures, the Measure Energy (saved) is taken from the TRM. Since the

¹¹ Order, Docket No. 12-GIMX-337-GIV, p. 4-5 (Mar. 6, 2013).

¹² See generally Application for Kansas City Power & Light Company, Docket No. 16-KCPE-446-TAR (Apr. 6, 2016).

¹³ Direct Testimony of Robert H. Glass, PhD on behalf of the Staff of the State of Kansas Corporation Commission, Docket No. 16-KCEP-446-TAR, p. 12 (Aug. 8, 2016).

1 TRM values are an average cost savings for a single implementation of a DSM
2 measure, it's probable that the actual total cost savings will be above or below, and
3 not right at, the TD calculation.

4 Customers primarily benefit from DSM programs through reductions in their
5 own utility bills. However, it is estimated that around 18% of customers will be
6 participating in some form of DSM program. The remaining 82% will not see an
7 immediate and tangible benefit from the programs, but will pay a share for the
8 incentives and programs. Calculations by Staff show that prior implementations of
9 DSM programs such as Whole Home Efficiency and Home Energy Education have
10 seen higher lost revenues than benefits, as seen in the table below. Data was taken
11 from the 2023 program year, using net present values and the ratepayer impact
12 test.¹⁴ Whole Home Efficiency sees lost revenue recovery that is about 37% higher
13 than the benefits it provides to ratepayers. Home Energy Education recovers
14 approximately 90% more lost revenue than it provides in benefits to ratepayers.
15 While these examples are more of an outlier, they serve to demonstrate that an
16 imbalance can exist between the value generated for the utility and the value
17 generated for ratepayers from DSM programs.

18 **Table 1**

Service Area	Program	Benefits	Lost Revenue
Evergy Kansas Metro	Whole Home Efficiency	\$ 2,112,105	\$ 2,993,175
19 Evergy Kansas Central	Home Energy Education	\$ 50,393	\$ 96,230

¹⁴ See the Response to Staff Data Request No. 56.

1 Without implementing any DSM programs, Evergy should not expect to earn
2 more than its authorized revenue requirement. If Evergy is able to implement DSM
3 programs and earn more than its authorized revenue requirement, Evergy would
4 unfairly benefit by virtue of recovering programs costs, lost revenues (above its
5 authorized revenue requirement) as well as an Earnings Opportunity.

6 **Q. Does Staff have a recommendation that would address Staff's concerns about**
7 **Lost Revenue potentially resulting in Evergy over-recovery?**

8 A. Yes, Staff recommends capping any TD charges flowing through the EE Rider by
9 the difference between Evergy's last-approved revenue requirement and the total
10 annual revenue from non-fuel base rates. A cap prevents any over-recovery from
11 occurring, similar to decoupling. Ratepayers in total are made no worse off by the
12 recovery of lost revenue tied to DSM programs, because the result is that Evergy
13 recovers only its revenue requirement, no more.

14 One disadvantage of straight decoupling mechanisms is that they typically do
15 not distinguish the cause of revenue loss. Whether changes in revenue are based
16 on unusual weather, DSM programs, or other externalities is not considered when
17 truing-up to the revenue requirement. Limited decoupling mechanisms (similar to
18 what Staff has recommended here) disallow recovery from specified causes, for
19 example, using weather normalization to remove the effects of weather from any
20 true-up.

21 Staff believes that the use of an LRAM mechanism makes the amount of
22 recovery attributed to DSM programs more transparent than the use of a limited
23 decoupling mechanism because lost revenue must be calculated for each program.

1 **Q. Does Staff have any other recommendations regarding Evergy’s proposed net**
2 **marginal revenue rates?**

3 A. Yes, Staff recommends a modification of Evergy’s proposed net marginal revenue
4 rates. Staff has reviewed the calculations used to generate the net marginal revenue
5 rates and has concluded variable costs have not been backed out of these energy
6 rates. Variable costs increase or decrease with the amount of energy generated/sold
7 by the utility; since DSM programs decrease the amount of energy being consumed
8 and generated, the amount of revenue needed to cover the utility’s cost of service
9 decreases accordingly. Hence, the portion of base rates that represents variable
10 costs should not be considered as lost revenue. Staff used the Class Cost of Service
11 from rate cases in Dockets 18-WSEE-328-RTS and 18-KCPE-480-RTS to
12 calculate variable costs included in the energy rate of each customer class to remove
13 Operations and Maintenance (O&M) Expenses from Evergy’s proposed net
14 marginal revenue rates. The calculated variable rates and Staff’s proposed net
15 marginal revenue rates are shown in the tables below. Staff contends that these
16 rates will lessen the likelihood of over-recovery of lost revenue.

17 The middle third of each table (variable costs in energy rate) is calculated for
18 each class and subtracted from the top third, Evergy’s proposed net marginal
19 revenue rate, to arrive at the bottom third, Staff’s proposed rates.

**** CONFIDENTIAL ****

Direct Testimony
Prepared by Douglas W. Hall
Docket No. 22-EKME-254-TAR

1

2 **E. Support for Staff's Modifications**

3

4 **Q. Can Staff provide examples of LRAMs in other states that support its**
5 **proposed modifications?**

6 A. Yes, Staff has found several examples based on the overview that ICF prepared for
7 Eversgy.¹⁵ Arizona permits lost fixed cost recovery by calculating allowed
8 distribution and transmission revenue for each class. Kentucky allows recovery of
9 lost revenue based on energy charges less fuel and other variable costs. North
10 Carolina removes fuel costs and O&M expenses from net lost revenue calculations.
11 Additionally, Louisiana has a soft cap on recovery (the cap is on monthly recovery
12 through the rider, and not on the actual amount to be recovered). New Hampshire
13 caps recovery based on a percentage of planned savings. South Carolina trues up
14 lost revenue based on the next available EM&V. These examples serve to
15 demonstrate that there is precedent across the Country for the modifications that
16 Staff is recommending to Eversgy's proposed TD mechanism.

17 **IV. Conclusion**

18 **Recommendation**

19 **Q. Please summarize Staff's recommendations.**

20 A. Staff recommends that Eversgy's TD proposal be accepted with the following
21 modifications:

¹⁵ CURB DR 30. Consulting firm ICF compiled a summary of financial recovery mechanisms used in jurisdictions across the country. The summary worksheet is attached as Appendix B. It is worth noting that out of states that allow revenue recovery mechanisms, 21 use decoupling, and 16 use LRAMs. This relatively even split indicates that both solutions are viable options for handling the issue of revenue recovery.

1 1. Lost revenue recovery should be capped at Evergy's last-approved base
2 revenue requirement in order to prevent over-recovery.

3 2. Staff's net marginal revenue rates should be used in place of Evergy's
4 proposed rates to ensure that only lost fixed costs (and not variable costs)
5 are being collected through the LRAM.

6 **Q. Does this conclude your testimony?**

7 A. Yes. Thank you.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC , & EVERGY KANSAS SOUTH, INC , d b a EVERGY KANSAS CENTRAL

SCHEDULE EER

(Name of Issuing Utility)

Replacing Schedule EER Sheet 1

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 22, 2020No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 1 of 12 Sheets

ENERGY EFFICIENCY RIDER
(LEGACY ENERGY EFFICIENCY AND DEMAND RESPONSE PROGRAMS)

APPLICABLE:

This Energy Efficiency Rider shall be applicable to all retail rate schedules of Evergy Kansas Central and Evergy Kansas South with the exception of Security Area Lighting Service, Street Lighting and Traffic Signal rate schedules.

PURPOSE:


This Energy Efficiency Rider is filed in compliance with the Commission's Order in Docket No. 08-GIMX-441-GIV and is designed to recover costs associated with Commission approved Energy Efficiency and Demand Response Programs deferred but not recovered. This Rider will be effective with the first billing cycle of November 2020 through the last billing cycle in October 2021. Evergy Kansas Central will file a new Energy Efficiency Rider for Commission approval in July 2021.

BASIS FOR CHARGE:

Energy Efficiency incremental program costs will be recovered using an Energy Efficiency (EE) factor applied to each applicable customer's bill. The EE factor will be applied to each applicable customer's energy usage by multiplying the kilowatt-hours (kWh) of electricity billed by the EE factor. The charge associated with this Energy Efficiency Rider will be identified and shown as a separate line on the applicable customer's monthly billings.

Issued December 17 2021
Month Day Year

Effective _____
Month Day Year

By 
Darrin Ives, Vice President

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC , & EVERGY KANSAS SOUTH, INC , d b a EVERGY KANSAS CENTRAL

SCHEDULE _____ EER _____

(Name of Issuing Utility)

Replacing Schedule _____ EER _____ Sheet _____ 2 _____

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed _____ September 22, 2020 _____

No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 2 of 12 Sheets

ENERGY EFFICIENCY RIDER
(LEGACY ENERGY EFFICIENCY AND DEMAND RESPONSE PROGRAMS)

ENERGY EFFICIENCY RIDER AMOUNT CALCULATION:

The initial EE factor will be calculated to recover actual program costs deferred for Commission approved Energy Efficiency programs deferred over a 12-month period ending in June of each year plus any true up amount from the prior period divided by the total applicable kWh as follows:

$$\text{EE factor} = \text{EE costs} + \text{True} / \text{kWh}$$

Where:

EE costs = The actual costs associated with Commission approved Energy Efficiency programs. These costs are recorded in separate sub-accounts of Account 182.3 Other Regulatory Assets for each approved Energy Efficiency or Demand Response Program and for demand response credits provided to customers under approved Demand Response Programs.

True = The annual true-up amount for an Energy Efficiency Rider year, to be determined prior to filing the next EE Rider and to be applied to the subsequent EE Factor calculation. The true-up will be the difference between the approved recovery amount and the actual recovery amount during the time the EE Factor was in effect.

kWh = The estimated kilowatt-hours for the period this EE factor will be applied to customers' monthly bills.

EE FACTOR:

\$0.000199 / kWh effective for the billing months of November 2020 through October 2021.

DEFINITIONS AND CONDITIONS:

1. All provisions of this Rider are subject to changes made by order of the regulatory authority having jurisdiction.

Issued _____ December _____ 17 _____ 2021
 Month Day Year

Effective _____
 Month Day Year

By _____
 Darrin Ives, Vice President

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC , & EVERGY KANSAS SOUTH, INC , d b a EVERGY KANSAS CENTRAL

SCHEDULE EER

(Name of Issuing Utility)

Replacing Schedule EER Sheet 3

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 22, 2020No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 3 of 12 Sheets

ENERGY EFFICIENCY RIDER**(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)****TRANSITION FROM LEGACY ENERGY EFFICIENCY PROGRAMS TO KEEIA 2023-2026 DSM PORTFOLIO:**

As Evergy Kansas Central transitions from the Legacy Energy Efficiency and Demand Response Programs (Legacy Programs), it is anticipated that Energy Efficiency (EE) Costs in July 2021 through June 2022 and True-Up for the preceding Energy Efficiency Rider year will be filed on July 15, 2022 for recovery over the period from November 2022 through October 2023. Further, EE Costs in the partial year from July 2022 through December 2022 and True-Up for the preceding Energy Efficiency Rider year will be filed on July 15, 2023 for recovery over the period from November 2023 through June 2024.

APPLICABLE:

This Energy Efficiency Rider shall be applicable to all non-lighting Retail Rate Schedules of Evergy Kansas Central and Evergy Kansas South. The Energy Efficiency Rider will be calculated and applied separately to Residential and Non-Residential customer classes.

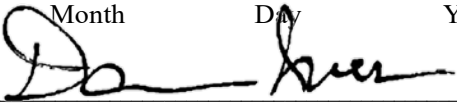
PURPOSE:

This Energy Efficiency Rider is filed in compliance with the Commission's Order in Docket No. XX-XXXX-XXX-XXX and is designed to recover costs associated with Commission approved KEEIA 2023 – 2026 DSM Portfolio deferred but not recovered and any remaining unrecovered charges from the Company's Legacy Energy Efficiency and Demand Response Programs. Those charges include:

- 1) Program Costs (PC), Throughput Disincentive (TD), and Earnings Opportunity Award (EO) (if any) for the KEEIA 2023 – 2026 DSM Portfolio and any true-up associated with Legacy Programs. Program Costs (PC) and Throughput Disincentive (TD) will include interest carrying costs at the Company's pretax Weighted Average Cost of Capital (WACC) on the unrecovered balances.

Issued December 17 2021
Month Day Year

Effective _____
Month Day Year

By 
Darrin Ives, Vice President

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC , & EVERGY KANSAS SOUTH, INC , d b a EVERGY KANSAS CENTRAL

SCHEDULE EER

(Name of Issuing Utility)

Replacing Schedule EER Sheet 4

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 22, 2020No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 4 of 12 Sheets

ENERGY EFFICIENCY RIDER**(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)**

- 2) Reconciliations, with interest, to true-up for differences between the revenues billed under this Energy Efficiency Rider and total actual monthly amounts for:
- i. Program Costs (PC) incurred.
 - ii. Throughput Disincentive (TD) incurred.
 - iii. Amortization of any Earnings Opportunity Award (EO) ordered by the Kansas Corporation Commission (Commission).
 - iv. Remaining unrecovered amounts associated with Legacy Programs.

BASIS FOR CHARGE:

Energy Efficiency incremental program costs will be recovered using an Energy Efficiency (EE) factor applied to each applicable customer's bill. The EE factor will be applied to each applicable customer's energy usage by multiplying the kilowatt-hours (kWh) of electricity billed by the EE factor for the respective Residential and Non-Residential customer class. The charge associated with this Energy Efficiency Rider will be identified and shown as a separate line on the applicable customer's monthly billings.

DEFINITIONS:

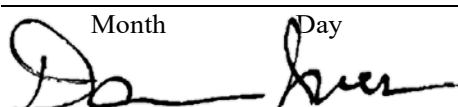
As used in this Energy Efficiency Rider, the following definitions shall apply:

"Throughput Disincentive" (TD) is meant to represent the utility's lost margins associated with the successful implementation of the KEEIA programs.

"Effective Period" (EP) means the year beginning with January 2023, and each year thereafter until all allowed charges associated with the approved KEEIA 2023 – 2026 DSM Portfolio are recovered.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC , & EVERGY KANSAS SOUTH, INC , d b a EVERGY KANSAS CENTRAL

SCHEDULE EER

(Name of Issuing Utility)

Replacing Schedule EER Sheet 5

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 22, 2020No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 5 of 12 Sheets

ENERGY EFFICIENCY RIDER**(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)**

"Evaluation Measurement & Verification" (EM&V) means the performance of studies and activities intended to evaluate the process of the utility's program delivery and oversight and to estimate and/or verify the estimated actual energy and demand savings, cost effectiveness, and other effects from demand-side programs.

"Incentive" means any consideration provided by the Company, including buy downs, markdowns, rebates, bill credits, payments to third parties, direct installation, giveaways, and education, which encourages the adoption of program measures.

"KEEIA 2023 – 2026 DSM Portfolio" consists of the demand-side programs and the Energy Efficiency Rider described in the KEEIA 2023 – 2026 DSM Portfolio Filing, which became effective following Commission order and approval of the KEEIA 2023 – 2026 DSM Portfolio under Docket No. XX-XXXX-XXX-XXX.

"Program Costs" (PC) means any prudently incurred program expenditures, including such items as program planning, program design; administration; delivery; end-use measures and incentive payments; advertising expense; evaluation, measurement, and verification; market potential studies; and other costs necessary to deliver approved programs.

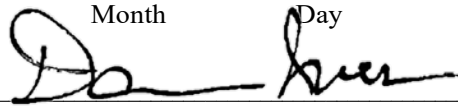
"Earnings Opportunity" (EO) means the annual incentive ordered by the Commission based on actual performance verified through EM&V against planned targets.

"Recovery Period" (RP) includes the twelve-month period beginning July 1, 2024 through June 30, 2025 and each twelve-month period thereafter.

"Weighted Average Cost of Capital" (WACC) means the return on rate base used to determine the revenue requirement in the Company's most recently completed general rate proceeding.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC , & EVERGY KANSAS SOUTH, INC , d b a EVERGY KANSAS CENTRAL

SCHEDULE EER

(Name of Issuing Utility)

Replacing Schedule EER Sheet 6

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

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ENERGY EFFICIENCY RIDER
(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

DETERMINATION OF ENERGY EFFICIENCY FACTOR RATES:

The Energy Efficiency Factor (EE Factor) during each applicable EP is a dollar per kWh rate for each non-lighting rate schedule calculated as follows:

$$\text{EE Factor} = [\text{PC} + \text{TD} + \text{EO} + \text{TRUE}]/\text{PE}$$

Where:

PC = Actual Program Costs incurred for the applicable EP. Such amounts shall include monthly interest on cumulative over- or under-balances at the Company's WACC.

TD = Throughput Disincentive is the Company's TD calculated by the Company during the applicable EP. See below for the detailed methodology for calculating the TD. Such amounts shall include monthly carrying costs on cumulative over- or under- balances at the Company's WACC.

EO = Earnings Opportunity is equal to the Earnings Opportunity Award means the annual incentive ordered by the Commission based on actual performance verified through EM&V against planned targets.

PE = Projected Energy, in kWh, forecasted to be delivered to the customers to which the Energy Efficiency Rider applies during the applicable RP.


The EE factor components and total EE Factor applicable to the Residential and Non-Residential rate schedules shall be rounded to the nearest \$0.00001.

CALCULATION OF TD:

Monthly Throughput Disincentive = the sum of the Throughput Disincentive Calculation for all programs applicable to (1) Residential and (2) Non-Residential customers.

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SCHEDULE EER

(Name of Issuing Utility)

Replacing Schedule EER Sheet 7

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

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Sheet 7 of 12 Sheets

ENERGY EFFICIENCY RIDER
(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

Throughput Disincentive Calculation:

The Throughput Disincentive Calculation for each program shall be determined by the formula:

$$TD\$ = MS \times NMR$$

Where:

TD\$ = Throughput Disincentive Dollars to be collected for a given calendar month, for a given class.

NMR = Net Margin Revenue. Net Margin revenue values for each class are provided below in the Net Margin Revenue Rates By Rate Class By Month table.

MS = The sum of all Programs' Monthly Savings in kWh, for a given month, for a given class. The Monthly Savings in kWh for each Program shall be determined by the formula:


$$MS = (MASCN + CASPM - RB) \times LS + HEE$$

RB = Rebasing Adjustment. The Rebasing Adjustment shall equal the CAS defined below applicable as of the date used for the KEEIA normalization in any general rate case resulting in new rates becoming effective during the accrual and collection of TD\$ pursuant to KEEIA 2023 – 2026 DSM Portfolio. In the event more than one general rate case resulting in new rates becoming effective during the accrual and collection of TD\$ pursuant to KEEIA 2023 – 2026 DSM Portfolio, the Rebasing Adjustment shall include each and every prior Rebasing Adjustment calculation.

LS = Load Shape. The Load Shape is the monthly load shape percent for each program as follows:

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SCHEDULE _____ EER _____

(Name of Issuing Utility)

Replacing Schedule _____ EER _____ Sheet _____ 8 _____

EVERGY KANSAS CENTRAL RATE AREA

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Program Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Whole Business Efficiency	8.117%	7.809%	8.087%	8.291%	9.156%	8.765%	9.264%	8.805%	7.652%	8.337%	8.021%	7.695%	100.000%
Hard-to-Reach Businesses	7.805%	7.539%	7.881%	8.365%	9.589%	9.288%	9.810%	8.999%	7.486%	8.080%	7.742%	7.416%	100.000%
Business Demand Response	1.864%	1.561%	1.245%	2.153%	7.472%	20.996%	22.390%	22.384%	14.106%	2.290%	1.409%	2.129%	100.000%
Business Energy Education	8.179%	8.120%	8.098%	8.325%	8.469%	7.799%	8.543%	8.495%	7.907%	9.084%	8.687%	8.294%	100.000%
Whole Home Efficiency	7.414%	6.352%	6.378%	5.881%	7.592%	12.023%	12.404%	12.462%	9.699%	6.203%	6.387%	7.204%	100.000%
Home Energy Education	7.702%	7.150%	8.021%	7.853%	8.530%	8.863%	9.385%	9.398%	8.511%	8.612%	7.952%	8.023%	100.000%
Hard-to-Reach Homes	5.945%	4.702%	3.666%	3.687%	7.312%	16.682%	17.456%	17.112%	11.193%	3.296%	3.617%	5.330%	100.000%
Home Demand Response	1.864%	1.561%	1.245%	2.153%	7.472%	20.996%	22.390%	22.384%	14.106%	2.290%	1.409%	2.129%	100.000%

Where:

MC = Measure Count. Measure Count, for a given month, for a given class, for each measure is the number of each measure installed in the current calendar month.

ME = Measure Energy. Measure Energy will be determined as follows, for each Measure:

- Prior to finalization of EM&V for KEEIA Year 1 programs, for Measures not listed under those programs listed in (iii) below, the ME is the annual total of normalized savings for each measure at customer meter per measure times the NTG factors defined in the Technical Resource Manual (TRM).
- After finalization of EM&V for KEEIA Year 1 programs, for Measures not listed under those programs listed in (iii) below, the ME is the annual total of normalized savings for each measure at customer meter per measure defined in the updated TRM (which will be updated based on EM&V ex-post gross adjustments and NTG factors determined for Year 1 no later than 24 months after the commencement of the KEEIA 2023 -2026 DSM Portfolio).
- For Custom Measures the ME will be the annual kWh savings calculated and reported monthly by the program implementers and aggregated by program and by customer class.

MAS = The sum of MC multiplied by ME for all measures in a program in the current calendar month.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC , & EVERGY KANSAS SOUTH, INC , d b a EVERGY KANSAS CENTRAL

SCHEDULE _____ EER _____

(Name of Issuing Utility)

Replacing Schedule _____ EER _____ Sheet _____ 9 _____

EVERGY KANSAS CENTRAL RATE AREA

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ENERGY EFFICIENCY RIDER**(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)**

CAS = Cumulative sum of MAS for each program for the KEEIA 2023 – 2026 DSM Portfolio

CM = Current calendar month

PM = Prior calendar month

HEE = Monthly kWh savings for the Home Energy Education program measured and reported monthly by the program implementer.

Measure – Energy efficiency measures described for each program in the Technical Resource Manual.

Programs – KEEIA 2023 – 2026 DSM Portfolio programs.

TRM – Commission-Approved Technical Resource Manual updated based on EM&V ex-post gross adjustments and NTG factors determined for Year 1 no later than 24 months after the commencement of the KEEIA 2023 – 2026 DSM Portfolio.

EARNINGS OPPORTUNITY:

The annual KEEIA 2023 – 2026 DSM Portfolio EO Award shall be calculated using the Earnings Opportunity Matrix below. The EO target at 100% is \$16,611,947. The EO cannot go above \$20,288,248. The cap is based on current program levels. If Commission-approved new programs are added during the approved program period, the Company may seek Commission approval to have the targets and cap of the EO increase proportionately to the increase in savings targets

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THE STATE CORPORATION COMMISSION OF KANSAS

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SCHEDULE EER

(Name of Issuing Utility)

Replacing Schedule EER Sheet 10

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

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ENERGY EFFICIENCY RIDER

(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

OTHER PROVISIONS:

The Company shall file an update to NMR rates by month by class contemporaneous with filing any compliance tariff sheets in any general rate case reflecting the rates set in that case, and the billing determinants used in setting rates in that case.

Annual kWh savings per measure will be updated prospectively in the TRM no later than 24 months after the commencement of the Plan based on EM&V ex-post gross adjustments determined for Year 1 and annually thereafter upon finalization of each subsequent program year EM&V report.

KEEIA NTG factors will be updated prospectively in the TRM no later than 24 months after the commencement of the Plan based on EM&V net-to-gross percentages for each program determined for Year 1 and annually thereafter upon finalization of each subsequent program year EM&V report.

FILING:

After the initial EE Rider rate adjustment filing, the Company shall make an Energy Efficiency Rider rate adjustment filing by March 31 following each program year to take effect each twelve-month period beginning in July and ending in June under the Term of this Energy Efficiency Rider.


EE Factors for the billing months of July 2024 through June 2025 are as follows:

Residential - \$0.00000

Non-Residential - \$0.00000

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(Name of Issuing Utility)

Replacing Schedule _____ EER _____ Sheet _____ 11 _____

EVERGY KANSAS CENTRAL RATE AREA

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ENERGY EFFICIENCY RIDER
(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

NET MARGIN REVENUE RATES BY RATE CLASS BY MONTH:


Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Residential	\$0.068283	\$0.069851	\$0.070796	\$0.071254	\$0.071239	\$0.075142	\$0.076291	\$0.076222	\$0.075656	\$0.070259	\$0.071159	\$0.069320
Non-Residential - SGS	\$0.060226	\$0.061301	\$0.061907	\$0.062193	\$0.062291	\$0.067485	\$0.066311	\$0.066473	\$0.066703	\$0.061947	\$0.061776	\$0.060842
Non-Residential - MGS	\$0.020503	\$0.020702	\$0.020748	\$0.020786	\$0.020783	\$0.026474	\$0.026290	\$0.026286	\$0.026303	\$0.020738	\$0.020684	\$0.020554
Non-Residential - LGS	\$0.027825	\$0.028206	\$0.027435	\$0.027418	\$0.027157	\$0.028306	\$0.029339	\$0.029061	\$0.029783	\$0.028756	\$0.027686	\$0.027959

EARNINGS OPPORTUNITY MATRIX:

Evergy Kansas Central KEEIA Cycle 1 EO Matrix									
No.	Metric	Programs	Target	Target Unit	Cycle EO Target	EO Amount per Target Unit	\$/Unit	Cycle EO Cap %	Cycle EO Cap
1	Education & Awareness : criteria will be customer opportunities and customers engaged	Home Energy Education Business Energy Education	100%	Threshold Metrics	\$561,983	\$561,982.97	\$	100%	\$561,983
2	Hard to Reach customer participation : criteria will be \$ invested and customers participating	Hard-to-Reach Homes Hard-to-Reach Businesses	100%	Threshold Metrics	\$1,344,760	\$1,344,760.15	\$	100%	\$1,344,760
3	EE & DR MWh : criteria will be first-year cumulative incremental MWh.	Whole Home Efficiency Home Demand Response Whole Business Efficiency	161,484	MWh	\$3,676,301	\$22.77	\$/MWh	125%	\$4,595,376
4	EE MW : criteria will be first-year cumulative incremental MW coincident with system peak.	Whole Home Efficiency Whole Business Efficiency	58	MW	\$6,617,342	\$113,283.02	\$/MW	125%	\$8,271,678
5	Business and Residential Demand Response MW impact : annual MW reduction capability	Home Demand Response Business Demand Response	109	MW	\$4,411,561	\$40,534.04	\$/MW	125%	\$5,514,451
	Total Forecasted Earnings Opportunity				\$16,611,947				\$20,288,248

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC , & EVERGY KANSAS SOUTH, INC , d b a EVERGY KANSAS CENTRAL

SCHEDULE _____ EER _____

(Name of Issuing Utility)

Replacing Schedule _____ EER _____ Sheet _____ 12 _____

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

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No supplement or separate understanding shall modify the tariff as shown hereon.

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ENERGY EFFICIENCY RIDER
(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

ANNUAL EARNINGS OPPORTUNITY CALCULATION:

<u>Evergy Kansas Central KEEIA Cycle 1 EO Annual Calculation</u>				
No.	Metric	Programs	Source of Inputs	EO Criterion and Calculation
1	Education & Awareness criteria will be customer opportunities and customers engaged	Home Energy Education Business Energy Education	The EM&V report will include documentation of all community events held, # of customers completing online energy tools and the customer surveys.	The performance metric will be based on key indicators of effective and widespread education of customers during the period. 1) Community Events held quarterly w/ documentation (4 / year) 2) minimum of 10% eligible customers completing online energy analysis yearly 3) EM&V customer survey of awareness of programs greater than 50% If all three criteria are met, annual EO will equal 25% of the Cycle 1 EO Target, if any criteria are not met the annual EO will equal \$0
2	Hard to Reach customer participation criteria will be \$ invested and customers participating	Hard-to-Reach Homes Hard-to-Reach Businesses	That actual spend will be reported directly out of the Company's accounting system and included in the EM&V report. The business customer # of participants by rate code will be provided in the final EM&V report for the calculation of % of participation	The performance metric will be based on key indicators of participation of hard-to-reach customers during the period. 1) Actual spend for Hard-to-Reach Home program exceeds 85% of approved annual budget 2) Ratio of participants with small business rate codes in the Hard-to-Reach Business and Whole Business Efficiency to total participants exceeds 20% If both criteria are met, annual EO will equal 25% of the Cycle 1 EO Target, if any criteria are not met the annual EO will equal \$0
3	EE & DR MWh criteria will be first-year cumulative incremental MWh.	Whole Home Efficiency Home Demand Response Whole Business Efficiency	The EM&V report will include a subtotal of portfolio energy savings matching the definition of this performance metric for each program year.	Evaluated net MWh for subject programs times the EO Amount per Target Unit, subject to limitation of the Cycle EO Cap.
4	EE MW criteria will be first-year cumulative incremental MW coincident with system peak.	Whole Home Efficiency Whole Business Efficiency	The EM&V report will include a subtotal of portfolio demand savings matching the definition of this performance metric for each program year.	Evaluated net MW for subject programs times the EO Amount per Target Unit, subject to limitation of the Cycle EO Cap.
5	Business and Residential Demand Response MW impact annual MW reduction capability	Home Demand Response Business Demand Response	The EM&V report will include a subtotal of portfolio demand savings matching the definition of this performance metric for each program year.	Evaluated net MW for subject programs times the EO Amount per Target Unit, subject to limitation of the Cycle EO Cap.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY METRO, INC., d.b.a. EVERGY KANSAS METRO

(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 1which was filed June 29, 2021No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 1 of 13 Sheets

**ENERGY EFFICIENCY RIDER
LEGACY ENERGY EFFICIENCY PROGRAMS****AVAILABILITY:**

This Energy Efficiency (EE) Rider (Schedule EE) shall be applicable to all non-lighting Kansas Retail Rate Schedules for Evergy Kansas Metro.

PURPOSE:

This EE Rider is designed to recover all costs associated with the following Commission-approved Income-Eligible, Energy Efficiency and Demand Response schedules: (1) IEW; (2) PT; (3) BOC; (4) ER; (5) CHP; (6) NH; (7) RHER; (8) RSTP; and (9) DRI. Evergy Kansas Metro will file a new EE Rider no later than March 31 of each year to recover EE Program costs incurred during the prior calendar year for recovery over the following July through June period.

BASIS:

Program Costs will be recovered using an EE factor applied to each customer's bill. The EE factor will be applied to the customer's usage on a kilowatt-hour basis (\$/kWh). Retail customer charges for EE Program Costs are determined by multiplying the kilowatt-hours of electricity billed by the corresponding EE factor. The customer charges associated with this EE Rider will be identified and shown as a separate line on the customer's bill.

ENERGY EFFICIENCY RIDER AMOUNT CALCULATION:

A separate EE factor will be calculated for each customer class based upon the demand allocator and total kWh for each class. The EE factor (EEF) for each customer class will be calculated to recover the Program Costs for approved EE Programs from the specified period plus any applicable true up amount from the prior period by applying a class Demand Allocator and then dividing by the total kilowatt-hours (kWh) for that class as follows:

$$EEF_{(class)} = \frac{(EEC_n + TRUE_{n-1}) \times DA_{(class)}}{KWH_n (class)}$$

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY METRO, INC., d.b.a. EVERGY KANSAS METRO

(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 2which was filed June 29, 2021No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 2 of 13 Sheets

**ENERGY EFFICIENCY RIDER
LEGACY ENERGY EFFICIENCY PROGRAMS**

Where:

EEC_n = All actual costs associated with Commission-approved EE Programs incurred during the applicable time-period (n). These costs are recorded in a deferred regulatory asset account established to accumulate the Kansas jurisdictional costs of all EE Programs.

$TRUE_{n-1}$ = The annual true-up amount for an EE Rider year, to be determined prior to filing the next EE Rider and to be applied to the subsequent EE factor calculation. The true-up amount will reflect any difference between the total EE revenue collected and the actual costs (EEC_n) for the previous applicable time-period (n-1). Such true-up amount may be positive or negative. The true-up amount used to calculate the EEF for the first EE Rider equals zero.

$DA_{(class)}$ = The demand allocator for the applicable non-lighting classes. This demand allocator shall be based on the 12-CP allocator utilized by the Company for its Class Cost of Service Study in the most recent Kansas retail rate case.

$KWH_{n(class)}$ = The actual kWh electric sales for the Kansas jurisdiction for the applicable time-period (n) of the Class Cost of Service Study for the applicable class.

TERM:


This EE Rider shall remain in effect until such time the Commission-approved amount is recovered. In the event the Commission rules on, or a law is passed regarding treatment of such expenses, then Evergy Kansas Metro shall have the right to file for Commission approval of a compliant recovery methodology to replace or revise this EE Rider. Evergy Kansas Metro shall have the right to continue recovery under this EE Rider until such time a replacement methodology is approved and implemented or all Commission-approved amounts are recovered.

NOTES TO THE TARIFF:

1. The references to Accounts within the EE tariff are as defined in the FERC uniform system of accounts.
2. The EEC factor will be expressed in dollars per kilowatt-hour (kWh) rounded to five decimal places.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY METRO, INC., d.b.a. EVERGY KANSAS METRO

(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 3

which was filed June 29, 2021

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shall modify the tariff as shown hereon.

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**ENERGY EFFICIENCY RIDER
LEGACY ENERGY EFFICIENCY PROGRAMS**

EE FACTORS FOR JULY 1, 2021 THROUGH JUNE 30, 2022 USAGE:

- | | | |
|----|------------------------|---------------|
| 1. | Residential Service | \$0.00010/kWh |
| 2. | Small General Service | \$0.00009/kWh |
| 3. | Medium General Service | \$0.00009/kWh |
| 4. | Large General Service | \$0.00008/kWh |

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY METRO, INC., d.b.a. EVERGY KANSAS METRO

(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 4which was filed June 29, 2021No supplement or separate understanding
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ENERGY EFFICIENCY RIDER**(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)****TRANSITION FROM LEGACY ENERGY EFFICIENCY PROGRAMS TO KEEIA 2023-2026 DSM PORTFOLIO:**

As Evergy Kansas Metro transitions from the Legacy Energy Efficiency Programs (Legacy Programs), it is anticipated that Energy Efficiency (EE) Costs in 2021 and True-Up for the preceding Energy Efficiency Rider year will be filed in March 2022 for recovery over the period from July 2022 through June 2023. Further, EE Costs in 2022 and True-Up for the preceding Energy Efficiency Rider year will be filed in March 2023 for recovery over the period from July 2023 through June 2024.

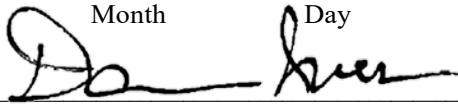
APPLICABLE:

This Energy Efficiency Rider shall be applicable to all non-lighting Kansas Retail Rate Schedules for Evergy Kansas Metro. The Energy Efficiency Rider will be calculated and applied separately to Residential and Non-Residential customer classes.

PURPOSE:

This Energy Efficiency Rider is filed in compliance with the Commission's Order in Docket No. XX-XXXX-XXX-XXX and is designed to recover costs associated with Commission approved KEEIA 2023 – 2026 DSM Portfolio deferred but not recovered and any remaining unrecovered charges from the Company's Legacy Energy Efficiency Programs. Those charges include:

- 1) Program Costs (PC), Throughput Disincentive (TD), and Earnings Opportunity Award (EO) (if any) for the KEEIA 2023 – 2026 DSM Portfolio and any true-up associated with Legacy Programs. Program Costs (PC) and Throughput Disincentive (TD) will include interest carrying costs at the Company's pretax Weighted Average Cost of Capital (WACC) on the unrecovered balances.
- 2) Reconciliations, with interest, to true-up for differences between the revenues billed under this Energy Efficiency Rider and total actual monthly amounts for:

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Darrin Ives, Vice President

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY METRO, INC., d.b.a. EVERGY KANSAS METRO

(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 5which was filed June 29, 2021No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 5 of 13 Sheets

ENERGY EFFICIENCY RIDER**(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)**

- i. Program Costs (PC) incurred.
- ii. Throughput Disincentive (TD) incurred.
- iii. Amortization of any Earnings Opportunity Award (EO) ordered by the Kansas Corporation Commission (Commission)
- iv. Remaining unrecovered amounts associated with Legacy Programs.

BASIS FOR CHARGE:

Energy Efficiency incremental program costs will be recovered using an Energy Efficiency (EE) factor applied to each applicable customer's bill. The EE factor will be applied to each applicable customer's energy usage by multiplying the kilowatt-hours (kWh) of electricity billed by the EE factor for the respective Residential and Non-Residential customer class. The charge associated with this Energy Efficiency Rider will be identified and shown as a separate line on the applicable customer's monthly billings.

DEFINITIONS:

As used in this Energy Efficiency Rider, the following definitions shall apply:

"Throughput Disincentive" (TD) is meant to represent the utility's lost margins associated with the successful implementation of the KEEIA programs.

"Effective Period" (EP) means the year beginning with January 2023, and each year thereafter until all allowed charges associated with the approved KEEIA 2023 – 2026 DSM Portfolio are recovered.

"Evaluation Measurement & Verification" (EM&V) means the performance of studies and activities intended to evaluate the process of the utility's program delivery and oversight and to estimate and/or verify the estimated actual energy and demand savings, cost effectiveness, and other effects from demand-side programs.

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THE STATE CORPORATION COMMISSION OF KANSAS

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(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 6which was filed June 29, 2021No supplement or separate understanding
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ENERGY EFFICIENCY RIDER**(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)**

"Incentive" means any consideration provided by the Company, including buy downs, markdowns, rebates, bill credits, payments to third parties, direct installation, giveaways, and education, which encourages the adoption of program measures.

"KEEIA 2023 – 2026 DSM Portfolio" consists of the demand-side programs and the Energy Efficiency Rider described in the KEEIA 2023 – 2026 DSM Portfolio, which became effective following Commission order and approval of the KEEIA 2023 – 2026 DSM Portfolio under Docket No. XX-XXXX-XXX-XXX.

"Program Costs" (PC) means any prudently incurred program expenditures, including such items as program planning, program design; administration; delivery; end-use measures and incentive payments; advertising expense; evaluation, measurement, and verification; market potential studies; and other costs necessary to deliver approved programs.

"Earnings Opportunity" (EO) means the annual incentive ordered by the Commission based on actual performance verified through EM&V against planned targets.

"Recovery Period" (RP) includes the twelve-month period beginning July 1, 2024 through June 30, 2025 and each twelve-month period thereafter.

"Weighted Average Cost of Capital (WACC)" means the return on rate base used to determine the revenue requirement in the Company's most recently completed general rate proceeding.


DETERMINATION OF ENERGY EFFICIENCY FACTOR RATES:

The Energy Efficiency Factor (EE Factor) during each applicable EP is a dollar per kWh rate for each non-lighting rate schedule calculated as follows:

$$EE \text{ Factor} = [PC + TD + EO + TRUE]/PE$$

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(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 7which was filed June 29, 2021No supplement or separate understanding
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ENERGY EFFICIENCY RIDER
(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

Where:

PC = Actual Program Costs incurred for the applicable EP. Such amounts shall include monthly interest on cumulative over- or under-balances at the Company's WACC.

TD = Throughput Disincentive is the Company's TD calculated by the Company during the applicable EP. See below for the detailed methodology for calculating the TD. Such amounts shall include monthly carrying costs on cumulative over- or under- balances at the Company's WACC.

EO = Earnings Opportunity is equal to the Earnings Opportunity Award means the annual incentive ordered by the Commission based on actual performance verified through EM&V against planned targets.

PE = Projected Energy, in kWh, forecasted to be delivered to the customers to which the Energy Efficiency Rider applies during the applicable RP.

The EE factor components and total EE Factor applicable to the Residential and Non-Residential rate schedules shall be rounded to the nearest \$0.00001.

CALCULATION OF TD:

Monthly Throughput Disincentive = the sum of the Throughput Disincentive Calculation for all programs applicable to (1) Residential and (2) Non-Residential customers.

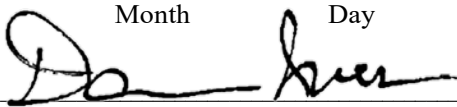
Throughput Disincentive Calculation:

The Throughput Disincentive Calculation for each program shall be determined by the formula:

$$TD\$ = MS \times NMR$$

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SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

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Replacing Schedule EE Sheet 8which was filed June 29, 2021No supplement or separate understanding
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ENERGY EFFICIENCY RIDER
(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

Where:

TD\$ = Throughput Disincentive Dollars to be collected for a given calendar month, for a given class.

NMR = Net Margin Revenue. Net Margin revenue values for each class are provided below in the Net Margin Revenue Rates By Class By Month table.

MS = The sum of all Programs' Monthly Savings in kWh, for a given month, for a given class. The Monthly Savings in kWh for each Program shall be determined by the formula:


$$MS = (MASCM + CASPM - RB) \times LS + HEE$$

RB = Rebasing Adjustment. The Rebasing Adjustment shall equal the CAS defined below applicable as of the date used for the KEEIA normalization in any general rate case resulting in new rates becoming effective during the accrual and collection of TD\$ pursuant to KEEIA 2023 – 2026 DSM Portfolio. In the event more than one general rate case resulting in new rates becoming effective during the accrual and collection of TD\$ pursuant to KEEIA 2023 – 2026 DSM Portfolio, the Rebasing Adjustment shall include each and every prior Rebasing Adjustment calculation.

LS = Load Shape. The Load Shape is the monthly load shape percent for each program as follows:

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(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 9which was filed June 29, 2021No supplement or separate understanding
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ENERGY EFFICIENCY RIDER
(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

Program Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Whole Business Efficiency	8.117%	7.809%	8.087%	8.291%	9.156%	8.765%	9.264%	8.805%	7.652%	8.337%	8.021%	7.695%	100.000%
Hard-to-Reach Businesses	7.805%	7.539%	7.881%	8.365%	9.589%	9.288%	9.810%	8.999%	7.486%	8.080%	7.742%	7.416%	100.000%
Business Demand Response	1.864%	1.561%	1.245%	2.153%	7.472%	20.996%	22.390%	22.384%	14.106%	2.290%	1.409%	2.129%	100.000%
Business Energy Education	8.179%	8.120%	8.098%	8.325%	8.469%	7.799%	8.543%	8.495%	7.907%	9.084%	8.687%	8.294%	100.000%
Whole Home Efficiency	7.414%	6.352%	6.378%	5.881%	7.592%	12.023%	12.404%	12.462%	9.699%	6.203%	6.387%	7.204%	100.000%
Home Energy Education	7.702%	7.150%	8.021%	7.853%	8.530%	8.863%	9.385%	9.398%	8.511%	8.612%	7.952%	8.023%	100.000%
Hard-to-Reach Homes	5.945%	4.702%	3.666%	3.687%	7.312%	16.682%	17.456%	17.112%	11.193%	3.296%	3.617%	5.330%	100.000%
Home Demand Response	1.864%	1.561%	1.245%	2.153%	7.472%	20.996%	22.390%	22.384%	14.106%	2.290%	1.409%	2.129%	100.000%

Where:


MC = Measure Count. Measure Count, for a given month, for a given class, for each measure is the number of each measure installed in the current calendar month.

ME = Measure Energy. Measure Energy will be determined as follows, for each Measure:

- i. Prior to finalization of EM&V for KEEIA Year 1 programs, for Measures not listed under those programs listed in (iii) below, the ME is the annual total of normalized savings for each measure at customer meter per measure times the NTG factors defined in the Technical Resource Manual (TRM).
- ii. After finalization of EM&V for KEEIA Year 1 programs, for Measures not listed under those programs listed in (iii) below, the ME is the annual total of normalized savings for each measure at customer meter per measure defined in the updated TRM (which will be updated based on EM&V ex-post gross adjustments and NTG factors determined for Year 1 no later than 24 months after the commencement of KEEIA 2023 – 2026 DSM Portfolio).
- iii. For Custom Measures the ME will be the annual kWh savings calculated and reported monthly by the program implementers and aggregated by program and by customer class.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY METRO, INC., d.b.a. EVERGY KANSAS METRO

(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 10

which was filed June 29, 2021

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**ENERGY EFFICIENCY RIDER
(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)**

MAS = The sum of MC multiplied by ME for all measures in a program in the current calendar month.

CAS = Cumulative sum of MAS for each program for the KEEIA 2023 – 2026 DSM Portfolio

CM = Current calendar month

PM = Prior calendar month

HEE = Monthly kWh savings for the Home Energy Education program measured and reported monthly by the program implementer.

Measure – Energy efficiency measures described for each program in the Technical Resource Manual.

Programs – KEEIA 2023 – 2026 DSM Portfolio programs.

TRM – Commission-Approved Technical Resource Manual updated based on EM&V ex-post gross adjustments and NTG factors determined for Year 1 no later than 24 months after the commencement of KEEIA the 2023 – 2026 DSM Portfolio.

EARNINGS OPPORTUNITY:

The annual KEEIA EO Award shall be calculated using the Earnings Opportunity Matrix below. The EO target at 100% is \$5,991,301. The EO cannot go above \$7,335,349. The cap is based on current program levels. If Commission- approved new programs are added during the approved program period, the Company may seek Commission approval to have the targets and cap of the EO increase proportionately to the increase in savings targets

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(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 11

which was filed June 29, 2021

No supplement or separate understanding
shall modify the tariff as shown hereon.

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ENERGY EFFICIENCY RIDER

(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

OTHER PROVISIONS:

The Company shall file an update to NMR rates by month by class contemporaneous with filing any compliance tariff sheets in any general rate case reflecting the rates set in that case, and the billing determinants used in setting rates in that case.

Annual kWh savings per measure will be updated prospectively in the TRM no later than 24 months after the commencement of the KEEIA 2023 – 2026 DSM Portfolio based on EM&V ex-post gross adjustments determined for Year 1 and annually thereafter upon finalization of each subsequent program year EM&V report.

KEEIA NTG factors will be updated prospectively in the TRM no later than 24 months after the commencement of the KEEIA 2023 – 2026 DSM Portfolio based on EM&V net-to-gross percentages for each program determined for Year 1 and annually thereafter upon finalization of each subsequent program year EM&V report.

FILING:

After the initial EE Rider rate adjustment filing, the Company shall make an Energy Efficiency Rider rate adjustment filing by March 31 following each program year to take effect each twelve-month period beginning in July and ending in June under the Term of this Energy Efficiency Rider.

EE Factors for the billing months of July 2024 through June 2025 are as follows:

Residential - \$0.00000

Non-Residential - \$0.00000

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SCHEDULE EE

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ENERGY EFFICIENCY RIDER
(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

NET MARGIN REVENUE RATES BY CLASS BY MONTH:

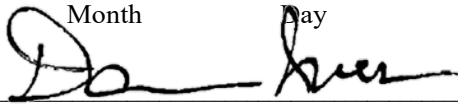
Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Residential	\$0.075300	\$0.076200	\$0.076780	\$0.077390	\$0.082170	\$0.102590	\$0.104940	\$0.104940	\$0.101690	\$0.081780	\$0.077800	\$0.076380
Non-Residential - SGS	\$0.083130	\$0.086180	\$0.089830	\$0.091090	\$0.096080	\$0.111090	\$0.111970	\$0.111240	\$0.107700	\$0.094880	\$0.090140	\$0.086290
Non-Residential - MGS	\$0.065020	\$0.067370	\$0.071180	\$0.071450	\$0.075680	\$0.084470	\$0.086370	\$0.086060	\$0.083920	\$0.075060	\$0.071960	\$0.066910
Non-Residential - LGS	\$0.051220	\$0.052950	\$0.054250	\$0.055120	\$0.056690	\$0.061790	\$0.062270	\$0.061920	\$0.060790	\$0.056780	\$0.054070	\$0.052460

EARNINGS OPPORTUNITY MATRIX:

Evergy Kansas Metro KEEIA 2023-2026 DSM Plan EO Matrix									
No.	Metric	Programs	Target	Target Unit	2023-2026 EO Target	EO Amount per Target Unit	\$/Unit	Cycle EO Cap %	2023-2026 EO Cap
1	Education & Awareness : criteria will be customer opportunities and customers engaged	Home Energy Education Business Energy Education	100%	Threshold Metrics	\$173,026	\$173,026.17	\$	100%	\$173,026
2	Hard to Reach customer participation : criteria will be \$ invested and customers participating	Hard-to-Reach Homes Hard-to-Reach Businesses	100%	Threshold Metrics	\$442,081	\$442,081.48	\$	100%	\$442,081
3	EE & DR MWh : criteria will be first-year cumulative incremental MWh.	Whole Home Efficiency Home Demand Response Whole Business Efficiency Pilot Incubator	68,986	MWh	\$1,344,048	\$19.48	\$/MWh	125%	\$1,680,060
4	EE MW : criteria will be first-year cumulative incremental MW coincident with system peak.	Whole Home Efficiency Whole Business Efficiency Pilot Incubator	22.985	MW	\$2,419,287	\$105,255.75	\$/MW	125%	\$3,024,109
5	Business and Residential Demand Response MW impact : annual MW reduction capability	Home Demand Response Business Demand Response	46.668	MW	\$1,612,858	\$34,560.10	\$/MW	125%	\$2,016,073
	Total Forecasted Earnings Opportunity				\$5,991,301				\$7,335,349

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SCHEDULE EE

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(Territory to which schedule is applicable)

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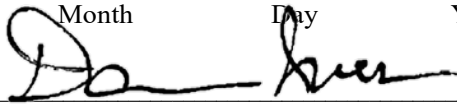
ENERGY EFFICIENCY RIDER
(KEEIA 2023-2026 DSM Portfolio Approved Under Kansas Energy Efficiency Investment Act)

ANNUAL EARNINGS OPPORTUNITY CALCULATION:

Evergy Kansas Metro KEEIA 2023-2026 DSM Plan EO Annual Calculation				
No.	Metric	Programs	Source of Inputs	EO Criterion and Calculation
1	Education & Awareness criteria will be customer opportunities and customers engaged	Home Energy Education Business Energy Education	The EM&V report will include documentation of all community events held, # of customers completing online energy tools and the customer surveys.	The performance metric will be based on key indicators of effective and widespread education of customers during the period. 1) Community Events held quarterly w/ documentation (4 / year) 2) minimum of 10% eligible customers completing online energy analysis yearly 3) EM&V customer survey of awareness of programs greater than 50% If all three criteria are met, annual EO will equal 25% of the Cycle 1 EO Target, if any criteria are not met the annual EO will equal \$0
2	Hard to Reach customer participation criteria will be \$ Invested and customers participating	Hard-to-Reach Homes Hard-to-Reach Businesses	That actual spend will be reported directly out of the Company's accounting system and included in the EM&V report. The business customer # of participants by rate code will be provided in the final EM&V report for the calculation of % of participation	The performance metric will be based on key indicators of participation of hard-to-reach customers during the period. 1) Actual spend for Hard-to-Reach Home program exceeds 85% of approved annual budget 2) Ratio of participants with small business rate codes in the Hard-to-Reach Business and Whole Business Efficiency to total participants exceeds 20% If both criteria are met, annual EO will equal 25% of the Cycle 1 EO Target, if any criteria are not met the annual EO will equal \$0
3	EE & DR MWh criteria will be first-year cumulative incremental MWh.	Whole Home Efficiency Home Demand Response Whole Business Efficiency Pilot Incubator	The EM&V report will include a subtotal of portfolio energy savings matching the definition of this performance metric for each program year.	Evaluated net MWh for subject programs times the EO Amount per Target Unit, subject to limitation of the Cycle EO Cap.
4	EE MW criteria will be first-year cumulative incremental MW coincident with system peak.	Whole Home Efficiency Whole Business Efficiency Pilot Incubator	The EM&V report will include a subtotal of portfolio demand savings matching the definition of this performance metric for each program year.	Evaluated net MW for subject programs times the EO Amount per Target Unit, subject to limitation of the Cycle EO Cap.
5	Business and Residential Demand Response MW impact annual MW reduction capability	Home Demand Response Business Demand Response	The EM&V report will include a subtotal of portfolio demand savings matching the definition of this performance metric for each program year.	Evaluated net MW for subject programs times the EO Amount per Target Unit, subject to limitation of the Cycle EO Cap.

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State	Revenue Recovery Mechanism [Decoupling or Lost Revenue Adjustment Margin (LRAM)]					Source (1,2 &4)			Performance Incentive Mechanisms				Source (3)	Source 4
	Revenue Recovery Mechanism Type	Applicable utilities	Year Authorized	Description of Mechanism	Relevant rules and statutes	ACEEE	CZES	IEI	Incentive Mechanism Type	Threshold requirements	Overall incentive structure	Cap or max incentive	ACEEE	IEI
Alabama	LRAM	Alabama Power Company and Alabama Gas Company		Recovery of total costs and recovery of reasonable return through RSE (rate stabilization) on and equalization on.			X		Shared Net Benefits				X	X
A Kansas	LRAM	All electric and gas investors owned utilities	2010	Under RSE, operations can go up or down to consume \$, depending on whether the return calculated falls above or below the authorized rate of return.		X	X		Shared Net Benefits	80% of net energy savings to get	10% of net benefits with cap	Range of 4m to 8m per annum	X	
A zona	LRAM	A zona Public Service Company, UNS Gas, Tucson Electric Power Company, and UNS Electric	2012-2013	A Kansas sales allow recovery of lost costs. These have been generally calculated as net savings minus base rates, with savings being adjusted to take into account the margin (in the year of measure) installation and associated cost of the equipment.	Docket 08-137-U.O de No. 14 73912	X			Shared Net Benefits	85% of gross savings goal	For 2013, 6-8 % of net benefits capped based on percentage of program costs. For 2014, \$0.0125 per kWh saved.	\$0.0125 per full-year kWh saved starting in 2014	X	
Ind ana	LRAM	Indiana Michigan Power, No the Indiana Public Service Company, Vect in Indiana, and Duke Energy Indiana. Request for lost revenue recovery by Indiana Power & Light Company, entirely based on the commission.	1995	A lost fixed cost rate is determined at the conclusion of a rate case by taking the sum of allowed direct but not an assumed on revenue for each rate class and dividing each by the expected class adjusted savings (kWh) minus the billing determinants. The lost fixed cost rate is multiplied by the recoverable kWh to the savings by the rate class.	170 IAC 4-6-6	X			Energy Savings-based	60% or 65% annual gross kWh savings to get achieved	PL Vect in and Duke have the standard established for program costs. B&M has the shared savings mechanism. Standard established for percentage of program costs that the utility may receive as performance incentive.	15% of program costs	X	
Kansas	LRAM	Westar Energy	2011	The Kansas Corporation Commission will consider proposals for electric and gas utilities that include shared savings performance incentives on a case-by-case basis. ICC approved lost margin recovery for Westar Energy's Simple Savings program.	Docket 08-GIMX-441-GV Docket 10-WSEE-775-TAR	X	X			No Performance Incentive Mechanism was available as of 2015			X	
Kentucky	LRAM	All regulated electric and natural gas utilities	1995	Energy savings are calculated based on engineering estimates for the participating programs, programs and multiplied by the number of participating programs. This is multiplied by the lost revenue factor (energy charges less fuel and other variable costs). The resulting three-year sunset provision on lost revenues.	Kentucky Statute 78.285 Case No 2014-00071 Case No 2014-00003	X	X		Shared Net Benefits	None	From 10% to 15% of net benefits for EE programs, excluding public education and pilot programs.	No cap	X	
Lou s ana	LRAM	Cleco Power, Entergy Gulf States, Entergy Louisiana, and Southwestern Electric Power Company (SWEPSCO)	2014	The lost cost but not fixed cost (LFCF) level for each customer class is initially determined by multiplying the "Class LFCF Factor" by the projected annual level of energy savings to be achieved through each Quota Station program. Generally, the "Class LFCF Factor" is calculated by dividing 12 months of customer class energy charges related revenue, including fuel multiplier plan increases or decreases, by the class kWh sales for the same period. The result is multiplied by LFCF recovery, but the result is an overall cap on energy efficiency rates of \$75 monthly as set forth by the EE rules.	Docket No. B-31106	X	X		Shared Net Benefits					X
M ssou	LRAM	American, GMD, ECPL	2013-2014	Utilities receive a percentage of net benefits calculated using deemed gross savings. Measure level annual energy and demand savings, measure values, after allowed energy savings and, after fuel and demand savings are deemed. Staff of the Missouri Public Service Commission on programs as a percentage of savings or less than the savings goal. The savings goal is used for the threshold of net benefits to be used for the incentive.	SB 276 Case No. EO 2012-0142 Case No. EO 2012-0166 Case No. EO-2012-0009 Case No. EJ-2012-0175	X			Shared Net Benefits	70% of approved three-year net savings to get	Three-tiered graduated scale, ranging from 70% to 130% of cumulative three-year savings to get. Specific savings by utility. For example, achieving 70% of savings goal pays 4.6% of net benefits, up to 6.19% for 130% or more, for American Missouri. Other similar.	Percentage shared net benefits capped per utility. No cap on dollar amount	X	
M ss s pp	LRAM	American Energy Corporation and Center for the Energy Missouri Power Company's cost recovery. The has not yet been approved.	2014	The company uses estimates for the coming year of savings due to energy efficiency programs no maladjusted for weather and multiplied by the number by the base rates unless otherwise change. Lost revenues are recovered annually through a utility up to adjust for any under-recovery.	Docket No. 2010-AD-2 O de Adopt ng Rule 29	X			Shared Net Benefits					X
Montana	LRAM	Nothing Westar Energy	2005	Lost revenues are recovered annually, with utilities using the tracking period on actual numbers available and again following a comparison report. Lost revenues are calculated by multiplying energy savings by an adjustment factor by rates. The adjustment factor takes into account fees for the program.	Docket No. D2014.6.53 Docket No. D2012.5.49	X			Shared Net Benefits					X
No th Ca of na	LRAM	Duke Energy Carolinas, Duke Energy Progress, Inc., and Dominion North Carolina Power	2007, with implementation on October 1, 2010-2013	The base calculation of net lost revenues (NLR) is performed by multiplying net kWh (and, in some cases, kWh savings) from each approved DSM/EEP program by the billing rates that would have been applied to those kWh, factually sold, and then reducing those lost revenues by the fuel cost recovery included in the billing rates, as well as nonfuel variable costs and maintenance expenses. In general, recovery of NLR for each installed measure is limited to a maximum of 36 months, subject to certain other limitations. NLR is also reduced by any net found revenues (revenues associated with other activities that cause an increase in demand).	NCGS 62-133.9 Docket No. E-100 Sub 113	X			Shared Net Benefits					X
New Hampsh e	LRAM		2017	The LRAM is determined by dividing the projected cumulative lost direct but not revenue related to energy efficiency savings for a time period by the projected billed consumption for the period in which they would be recovered. The savings that each utility may receive is capped at 110% of planned savings.			X		Energy Savings-based	Benefit cost at 0.0 and 50% of plan savings. Apply separately to residential and commercial and industrial sectors.	Electric utilities: 7.5% at and above 55% total/ferme energy savings. 6.0% applies below 55% total/ferme energy savings. Natural gas utilities based on recent revenue of 8%.	Electric maximum 10% at 55% savings and up to 8% under 55%. 5% cap each on kWh and cost-effectiveness components. Gas: 12% of costs	X	
Oklahoma	LRAM	Public Service of Oklahoma and Oklahoma Gas	2008	Lost revenues are calculated annually and a constant used until the next base rate case adjustment. During which time the lost revenues are added out and the approved volume reduction (adjustment) is included in the final rate. Lost revenues are calculated by multiplying energy savings by an embedded cost factor. The embedded cost factor is calculated by taking the embedded costs approved in the most recent rate case (less fixed customer charges) divided by the kWh used in the cost study.	PUD Cause No. 200700449, O de No. 555302	X			Shared Net Benefits	2015 will be pass cost-effectiveness test and 80% of net goal savings	15% of net benefits	Performance no cap in 2015 the cap will be 15% of net benefit	X	
South Ca of na	LRAM	Duke Energy Progress, Duke Energy California, and South California Electric and Gas	2008, established in 2013	Lost revenues are estimated annually and used once B&M's available. Lost revenue can be collected three years after installation on the final fee of the measure, which is the same as the lost revenues are calculated by multiplying energy savings by approved costs.	1.C. Code Ann § 58-37-30 Docket No. 2008-251-E (O de No. 2009-373)	X			Shared Net Benefits	Programs as a whole must pass the UCT	(6% SC&G 11.5% DEC) * [(net kWh and kWh savings over measure life) - avoided costs] - program costs) Amount over five years for SC&G	No cap	X	
South Dakota	LRAM	All investor-owned utilities	2009, most recent version in 2014	The lost revenues are negotiated as a percentage of approved budget spending. Savings are not included in the calculation of lost revenues, although they are estimated to ensure cost-effectiveness programs.	Docket NG09-001 Docket E111-802	X			Shared Net Benefits				X	X
Wyom ng	LRAM			Recovery is limited to the year expenses are incurred.	Docket No. 200004-65-E1-05					No Performance Incentive Mechanism was available				X

NOTES

* Current Massachusetts regulation has removed the 9% for performance metrics, meaning that the performance incentive mechanism will go forward no longer be best practice and as a multi-factor incentive. The description on how it applies to the mechanism as it was in 2014. Source: Public utility commission on staff responses to questions on measures.

- One respondent in Connecticut summarized the type of performance incentive mechanism type as a rate of return, although many of the features are a form of the savings-based type.
- Michigan performance incentive measures for energy efficiency by utility and may have a multi-performance outcomes including net income numbers and low-income customer savings, and participation on net cost to the customer measure programs. While performance incentives savings-based, they might also be reasonably coupled with multi-factor incentives.
- New York has expressed the maximum amount of the net revenue pool both as a percentage of total program costs and net income numbers of base points of the return on equity of an investor-owned utility. Source: Public utility commission on staff responses to questions on measures.

Sources

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- Center for Climate and Energy Solutions (CES) - <https://www.ces-ee.org/document/decoupling-report-2/>
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- The Edison Institute, Institute for Electric Innovation on Energy Efficiency Trends in the Electric Power Industry (2008-2017), 2019 <https://www.edisoninstitute.org/net/med/af/ies/IE/pub/cat/oms/IEI/ENE-Efficiency-Repo-1-Ma-2019.pdf>

Number of States with the Revenue Recovery Mechanism as a Performance Incentive

41

Number of States with Revenue Recovery Mechanism	
Decoupling	21
LRAM	16
Total	37

Number of States with Performance Incentive Mechanism	
Shared Net Benefits	20
Energy Savings-based	6
Multi-factor	6
Total	32

Financial Recovery Mechanism		Number of States
Revenue Recovery Mechanism	Decoupling	21
	LRAM	16
Performance Incentive Mechanism		32
The Revenue Recovery Mechanism as a Performance Incentive		41

STATE OF ILLINOIS)
) ss.
COUNTY OF COOK)

VERIFICATION

Douglas Hall, being duly sworn upon his oath deposes and states that he is a Rate Analyst for the Utilities Division of the Kansas Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Direct Testimony*, and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Douglas Hall
Rate Analyst
State Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 16 day of June, 2022.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

22-EKME-254-TAR

I, the undersigned, certify that a true and correct copy of the above and foregoing Direct Testimony was served via electronic service this 17th day of June, 2022, to the following:

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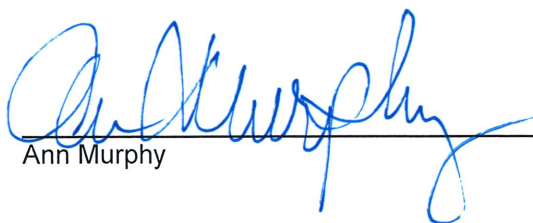
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